

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

DEVIN UPCHURCH	)	
	)	
Plaintiff,	)	Case No.: 08 C 2246
	)	
v.	)	Judge Guzman
	)	
P.O. K. KWIATKOWSKI Star No. 201,	)	Magistrate Judge Valdez
SGT P. RICHIE Star No. 47,	)	
P.O. C. ERICKSON Star No. 199,	)	
P.O. ZIEMINSKI Star No. 190, individually,	)	
and CALUMET CITY	)	
	)	
Defendants.	)	JURY DEMANDED

**JOINT INITIAL STATUS REPORT**

1. **Pre-Discovery Disclosures.** The parties will exchange by July 11, 2008, the information required by Fed.R.Civ.P. 26(a)(1).
2. **Discovery Plan.** The parties jointly propose to the court the following discovery plan:
  - a. Discovery will be needed on the following subjects:
    - i. The circumstances surrounding the arrest of Plaintiff by Defendants including whether the individual defendants had cause to stop, detain, search, strip search, use force against, or arrest Plaintiff.
  - b. All discovery commenced in time to be completed by December 12, 2008.
  - c. Maximum of 25 interrogatories by each party to other party with responses due 30 days after service.
  - d. Maximum of 25 requests for admission by each party to any other party with responses due 30 days after service.

- e. Number of depositions to be determined. Each deposition limited to maximum of seven (7) hours unless extended by agreement of parties.
- f. Reports from retained experts under Rule 26(a)(2) due from Plaintiff by September 30, 2008, and from Defendants by October 31, 2008.

3. **Other Items.**

- a. All potentially dispositive motions should be filed within 30 days of the close of all discovery.
- b. Settlement cannot be evaluated until after the depositions of the parties.
- c. The case should be ready for trial by February 2009.

4. Consent to Magistrate Judge

The parties consent to proceed before a Magistrate Judge

Date: June, 13, 2008

By: /s/ Leslie C. McCoy  
**Leslie C. McCoy**  
Attorney for Plaintiff  
Ed Fox & Associates  
300 West Adams Street, Suite 330  
Chicago, IL 60606

/s/ Robert R. Wilder  
**Robert R. Wilder**  
Attorney for Defendant  
Odelson & Sterk  
3318 W. 95th Street  
Evergreen Park, IL 60805